

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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This document relates to:

Burnett, et al. v. The Islamic Republic of Iran, et al.: No. 15-cv-9903 (GBD)(SN)

DECLARATION OF DANIELLA PETERS-NYLEN

I, DANIELLA PETERS-NYLEN, hereby declare under penalty of perjury as follows:

1. I am 35 years old and reside in Cohasset, Massachusetts.
2. I am the stepdaughter of Kevin P. Connors who was killed in the September 11, 2001 terrorist attacks on the World Trade Center in New York where he worked on the 84th floor as a senior vice president for Euro Brokers Inc.
3. At the time of his death on September 11, 2001, I was 15 years old and had been living together in the same household with Kevin, my mother and my siblings for approximately 10 years. Throughout that time, Kevin Connors was the father in my life and undertook to do all those things for me that a father does for his children.
4. I was approximately 5 years old when my mother, my siblings and I moved into Kevin Connors's home in Miami Beach, Florida where he lived with his children from a previous marriage. My mother and Kevin began seeing each other sometime before that but I do not recall exactly when they first began dating each other. In 1993, they married and our large family moved to an even bigger house in So. Miami Beach, Florida. Growing up in our family home, all the children were treated the same.

5. I do not recall when my mother and biological father separated and subsequently divorced; I was an infant at the time. Throughout the entire time I lived with Kevin Connors, my biological father lived abroad and continues to do so to today. Because he resided abroad, my biological father did not provide me those things a child of formidable age requires.

6. Although my mother worked throughout the time I was growing up, Kevin Connors was the breadwinner for our family and I was completely dependent on him for all my financial needs. Kevin claimed me as a dependent on his personal income tax returns and provided me with health insurance coverage. Along with my mother, Kevin Connors kept me fed, clothed, sheltered healthy and safe.

7. Growing up, our family shared evening meals together. It was a daily routine during which we discussed events in our personal lives and in the world at large. Kevin, who always knew the right subjects to talk about and, just as importantly, those to avoid, typically led the discussions.

8. As a graduate of the U.S. Naval Academy, Kevin Connors instilled in me the importance of a good education and a hard work ethic. However, he did more: he superintended and guided my education. Until I entered the 5th grade in approximately 1996, Kevin paid for my tuition at a private Catholic school. He also took on the financial responsibility for all the other costs associated with educating an adolescent; and not just for me, but for all my siblings as well. Kevin participated by attending parent-teacher conferences and other school events on a regular basis. In doing so set an example that I follow with my own children to this day.

9. Kevin excelled at sports and other physical pursuits and always stressed the importance of leading an active lifestyle as part of his emphasis on a good education and a hard

work ethic. He always made time to attend my soccer and tennis matches when I was in school. Again, he set the example.

10. Kevin taught me how to ride a bike and we would ride together regularly on the weekends as I was growing up. He also taught me the sport of rock climbing and when we took family vacations up to Maine, he and I would “find a face” to climb together.

11. Ours is a Catholic family and we attended Catholic Mass on a regular basis. After attending Mass on Sundays, Kevin would treat us all to dinner and a movie. Oftentimes, family members would split into groups depending on movie tastes. Kevin and I had the same taste in movies and I will always treasure my memories of “movie night” when he and I were the only two who opted for a particular movie while the other family members attended a different one. It gave me the opportunity to spend time with him one-on-one. Sometimes our family would attend Saturday night Mass so that we could maintain our ritual based on the movie schedules.

12. I always referred to Kevin Connors as “dad.” He gave me the nickname “Dani Girl.”

13. On September 10, 2001, the night before he was killed, Kevin presented me with a check for the cost of driving school lessons. I was still several months away from turning 16 but he knew how excited I was to start driving. This gesture not only provided another example of his financial support for me, but epitomized his support for any endeavor I undertook.

14. Two of my children are named in honor of their “grandpa Kevin.”

15. My dad, Kevin Connors, once told me of his dream as a child growing up in Quincy, Massachusetts to live on Jerusalem Rd. in Cohasset, Massachusetts. In 2015, my husband and I moved from New York City to Cohasset with our first baby. We live today just off Jerusalem Rd.

and I frequently see a Cardinal in our yard. I take comfort knowing Kevin is still looking out for me.

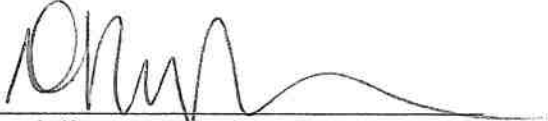
16. From the day he came into my life when I was a little girl, until the day he died on September 11, 2001, Kevin Connors was my father. He not only assumed all the financial responsibility of providing for me, he demonstrated everyday how a moral and ethical family-centered life was to be lived. I am the mother I am today because of the father Kevin was for me.

17. Since the day Kevin P. Connors died on September 11, 1001, there has been a void in my life that will never be filled.

I declare under penalty of perjury the foregoing is true and correct.

Date:

3/26/2021



Daniella Peters-Nylen